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JASON EDWARD THOMAS CARDIFF

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12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA

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UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
JASON EDWARD THOMAS  
CARDIFF,  
Defendant.

Case No. 5:23-cr-00021-JGB

**JASON CARDIFF'S REPLY IN  
SUPPORT OF EX PARTE  
APPLICATION AND REQUEST TO  
PARTICIPATE AND ATTEND  
JANUARY 30, 2025 MOTIONS  
HEARING BY VIDEO  
CONFERENCE**

The Government's opposition is overstated and over the top. Mr. Cardiff is not a fugitive within the meaning of the Fugitive Entitlement doctrine. Defendant's reason for staying in Ireland was to follow his doctor's orders not to fly until he completes a 3-4 month course of treatment with a return to the United States almost seven weeks prior to trial in July, 2025. Defendant had a Hobson's choice—comply

1 with the Court's order with a high risk of permanently damaging his pulmonary  
2 system, or follow his doctor's orders.

3 As to the Government's claim that Mr. Cardiff is a fugitive, Mr. Cardiff did not  
4 flee to Ireland but was granted leave to travel to Ireland. His location is well known  
5 and he is in contact with Pretrial Services per the Court's last order extending travel.  
6 The Government wants to have it both ways, penalize Mr. Cardiff for not wanting to  
7 risk even more serious health consequences by returning to the United States while  
8 delaying any explanation to the Court as to why the Government directed his arrest  
9 while on a court-authorized travel to his home in Ireland.

10 Mr. Cardiff should not be penalized and deprived of his right to participate in  
11 pretrial motions for unexpected health issues when he can participate by video  
12 conference.

13 Dated: January 29, 2025

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15 By: /s/ Stephen R. Cochell  
16 Stephen R. Cochell

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18 Attorney for Defendant  
JASON EDWARD THOMAS CARDIFF

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**SERVICE LIST**

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I HEREBY DECLARE THAT THE FOLLOWING COUNSEL HAVE BEEN  
21 SERVED WITH THIS DEFENDANT JASON CARDIFF'S NOTICE OF MOTIO  
AND MOTION TO SUPPRESS EVIDENCE THROUGH THE COURT'S ECF O  
22 NEXT GEN ELECTRONIC FILING SYSTEM:

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8 */S/ Stephen R. Cochell*  
9 Stephen R. Cochell

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